

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION**

DEFENSE DISTRIBUTED,

Plaintiff,

v.

YOUTUBE LLC, GOOGLE LLC, and
ALPHABET, INC.

Defendants.

Case No. 1:25-cv-1095

**DECLARATION OF MICHAEL A. ROME IN SUPPORT OF
DEFENDANTS' NOTICE OF REMOVAL**

I, Michael A. Rome, declare and state as follows:

1. I am a partner at Cooley LLP and an attorney of record for Defendants YouTube LLC, Google LLC, and Alphabet, Inc. (collectively, "Defendants") in the above-captioned matter. I am licensed to practice law in the state of California and my *pro hac vice* is forthcoming. I make this declaration based on my personal knowledge and, if called as a witness, I could and would testify competently to the matters stated herein.

2. I submit this declaration in support of Defendants' Notice of Removal, which removes this action, originally filed in the Third Business Court Division of the Business Court of the State of Texas, Case No. 25-BC03B-0009 ("State Court Action"), to the United States District Court for the Western District of Texas, Austin Division, pursuant to 28 U.S.C. §§ 1332, 1441, and 1446.

3. Attached hereto as **Exhibit A** are true and correct copies of all process, pleadings, and orders in the State Court Action received by Defendants.

4. Attached hereto as **Exhibit B** is a true and correct copy of Plaintiff's Articles of Incorporation with the State of Texas obtained from the Texas Secretary of State's website, <https://direct.sos.state.tx.us>, on June 23, 2025.

5. Attached hereto as **Exhibit C** is a true and correct copy of the results of an "Entity Name Search" for Defense Distributed obtained from the Texas Secretary of State's website, <https://direct.sos.state.tx.us>, on June 23, 2025.

I declare under penalty of perjury that the foregoing is true and correct. Executed on July 14, 2025 in Los Angeles, California.

/s/ Michael Rome
Michael A. Rome (*pro hac vice* forthcoming)

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